

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

)	
In re the Application of)	
)	
Advanced Television Systems)	MB Docket No. 87-268
And Their Impact Upon the)	
Existing Television Broadcast)	
Service)	
)	

To: The Commission

COMMENTS OF KETCHIKAN TV, LLC

Ketchikan TV, LLC (KTV), by its attorney and pursuant to Section 1.415 of the Commission's rules, 47 C.F.R. § 1.415, hereby submits its comments in response to the Seventh Further Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.¹ By its comments, KTV requests an alternative channel assignment from the proposed channel that appears in Appendix A of the NPRM, Proposed Rule Changes, and in Appendix B, Proposed DTV Table of Allotments Information.²

¹ *Seventh Further Notice of Proposed Rulemaking in MB Docket No. 87-268*, 71 Fed. Reg. 66591 (Nov. 15, 2006).

² Proposed Rule Changes, Part 73, Section 73.622(i), Digital television table of allotments.

In its NPRM, the Commission recognized that there are certain situations involving possible harmful interference or coordination challenges that warrant requests for alternative channel assignments. Specifically, it found that:

At this stage in the DTV channel election process, we will consider requests for alternative channel assignments only from . . . (3) licensees with TCDs for low-VHF channels (channels 2-6). . . .³

KTV (KTNL-DTV) holds TCD channel 2 in Sitka, Alaska, exactly the case identified by the Commission as warranting an alternative channel assignment.

Examination of the channel options available in Sitka suggests that channel 7 would represent an appropriate choice that would not cause or be subject to interference from sources within its service area. Attached hereto is an engineering analysis supporting KTV's request for DTV channel 7 in Sitka, Alaska.⁴

Accordingly, KTV requests that the Commission modify proposed Section 73.622(i) of the Rules to show Sitka assigned channel 7.

Respectfully submitted,

KETCHIKAN TV, LLC

³ See NPRM at para. 25.

⁴ See Attachment from consulting engineer Byron St. Clair.

By: _____

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